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Reply to: New York

November 9, 2022

Hon. Tonianne J. Bongiovanni, USMJ  
United States District Court-District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Room 2020  
Trenton, New Jersey 08608

**Re: *Joan Klayton et al v ARS Account Resolution, Healthcare Revenue  
Recovery Group, LLC et al.***  
**Civil Case No. 3:21-cv-10053 (MAS)(TJB)**

Your Honor:

Pursuant to the Court's September 6, 2022 Text Minute Entry, I write on behalf of Plaintiff and the putative class, *on consent*, to provide a status report on this case.

The parties' Counsel and Experian's Counsel have been communicating extensively about how certain information relied on by Experian can be produced. Experian's Counsel has indicated that the actual information cannot be produced in document form but that it could produce a confirming affidavit. To that end, the parties request an extension of fact to discovery for Experian to produce such affidavit and, depending on the information set forth in the affidavit, for the parties to complete depositions.

Should you have any further questions please do not hesitate to contact me.

Very truly yours,

/s/ Benjamin J. Wolf  
Benjamin J. Wolf, Esq.

Cc: Monica M. Littman, Esq. (via ECF)